

COUNT 1

(Interference with Commerce by Robbery, 18 U.S.C. § 1951(a))

The Grand Jury charges:

5. On or about February 15, 2019, in the Northern District of Ohio, Eastern Division, Defendant MATTHEW L. SHILLING did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that MATTHEW L. SHILLING, did unlawfully take and obtain monies and property, consisting of United States currency and cigarettes, in the custody, possession, and presence of employees of Circle K, located at 1370 E. Main Street, Ravenna, Ohio, against the employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

(Interference with Commerce by Robbery, 18 U.S.C. § 1951(a))

The Grand Jury further charges:

6. On or about February 18, 2019, in the Northern District of Ohio, Eastern Division, Defendant MATTHEW L. SHILLING did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that MATTHEW L. SHILLING, did unlawfully take and obtain monies and property, consisting of United States currency and cigarettes, in the custody, possession, and presence of employees of BP Gas Station located at

6134 State Highway 14, Ravenna, Ohio, against the employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in violation of Title 18, United States Code, Section 1951(a).

COUNT 3

(Interference with Commerce by Robbery, 18 U.S.C. § 1951(a))

The Grand Jury further charges:

7. On or about March 1, 2019, in the Northern District of Ohio, Eastern Division, Defendant MATTHEW L. SHILLING did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that MATTHEW L. SHILLING did unlawfully take and obtain monies and property, consisting of United States currency and cigarettes, in the custody, possession, and presence of employees of Circle K, located at 1029 W. Main Street, Ravenna, Ohio, against the employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in violation of Title 18, United States Code, Section 1951(a).

COUNT 4

(Bank Robbery, 18 U.S.C. § 2113(a))

The Grand Jury further charges:

8. On or about March 5, 2019, in the Northern District of Ohio, Eastern Division, Defendant MATTHEW L. SHILLING, by force, violence, and intimidation, did take from the person and presence of another approximately \$13,000.00 of money belonging to and in the care, custody, control, management, and possession of Chase Bank, 4000 Waterloo Road, Randolph,

Ohio, whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.